

1 COOLEY LLP  
BOBBY GHAJAR (198719)  
2 (bghajar@cooley.com)  
TERESA MICHAUD (296329)  
3 (tmichaud@cooley.com)  
COLETTE GHAZARIAN (322235)  
4 (cghazarian@cooley.com)  
1333 2nd Street, Suite 400  
5 Santa Monica, California 90401  
Telephone: (310) 883-6400  
6 MARK WEINSTEIN (193043)  
(mweinstein@cooley.com)  
7 KATHLEEN HARTNETT (314267)  
(khartnett@cooley.com)  
8 JUDD LAUTER (290945)  
(jlauter@cooley.com)  
9 ELIZABETH L. STAMESHKIN (260865)  
(lstameshkin@cooley.com)  
10 3175 Hanover Street  
Palo Alto, California 94304-1130  
11 Telephone: (650) 843-5000  
12 CLEARY GOTTlieb STEEN & HAMILTON LLP  
ANGELA L. DUNNING (212047)  
13 (adunning@cgsh.com)  
1841 Page Mill Road, Suite 250  
14 Palo Alto, California 94304  
Telephone: (650) 815-4131  
15 [Full Listing on Signature Page]  
16 Counsel for Defendant Meta Platforms, Inc.

17 UNITED STATES DISTRICT COURT  
18  
19 NORTHERN DISTRICT OF CALIFORNIA  
20  
21 SAN FRANCISCO DIVISION

21 RICHARD KADREY, *et al.*,  
22 Individual and Representative Plaintiffs,  
23 v.  
24 META PLATFORMS, INC., a Delaware  
corporation;  
25 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DEFENDANT META PLATFORMS, INC.'S  
RESPONSE TO COURT'S DISCOVERY ORDER  
OF DECEMBER 4, 2024 [DKT. 305]**

1 Pursuant to the Magistrates Judge’s Order on December 4, 2024 (Dkt. 305), Defendant Meta  
2 Platforms, Inc. (“Meta”) hereby submits as the attached **Exhibit 1** an unredacted copy of Exhibit C  
3 (Dkt. 260-5) to Plaintiffs’ Administrative Motion to Consider Whether Another Party’s Material  
4 Should Be Sealed filed on November 8, 2024 (Dkt. 260).

5 Further, Meta hereby submits as the attached exhibits below revised copies of Exhibits D-  
6 F to Plaintiffs’ Administrative Motion to Consider Whether Another Party’s Material Should Be  
7 Sealed filed on November 8, 2024 (Dkt. 260) with narrowly tailored redactions:

- 8 o **Exhibit 2:** a revised copy of Exhibit D (Dkt. 260-6)
- 9 o **Exhibit 3:** a revised copy of Exhibit E (Dkt. 260-7)
- 10 o **Exhibit 4:** a revised copy of Exhibit F (Dkt. 260-8)

11 Meta respectfully submits that good cause exists for the submission of the identified  
12 portions of these documents under seal for the reasons set forth in its earlier-filed Declaration of  
13 Michelle Woodhouse (Dkt. 282) in support of Plaintiffs’ Administrative Motion to Consider  
14 Whether Another Party’s Material Should Be Sealed filed on November 8, 2024 (Dkt. 260). Meta  
15 respectfully requests that the Court order sealed the redacted portions of revised Exhibits D-F.  
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18 *[Signature page follows.]*  
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2 Dated: December 11, 2024

COOLEY LLP

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4 By: /s/ Cole A. Poppell

5 Bobby Ghajar  
6 Philip Morton  
7 Mark Weinstein  
8 Kathleen Hartnett  
9 Teresa Michaud  
10 Matthew Brigham  
11 Judd Lauter  
12 Liz Stameshkin  
13 Colette Ghazarian  
14 Juan Pablo Gonzalez  
15 Cole A. Poppell

LEX LUMINA PLLC  
Mark A. Lemley

CLEARY GOTTlieb STEEN &  
HAMILTON LLP  
Angela L. Dunning

14 *Full Counsel List*

Attorneys for Defendant  
META PLATFORMS, INC.

15 COOLEY LLP  
16 PHILLIP MORTON (*pro hac vice*)  
17 (pmorton@cooley.com)  
18 COLE A. POPPELL (*pro hac vice*)  
19 (cpoppell@cooley.com)  
1299 Pennsylvania Avenue, NW, Suite 700  
Washington, DC 20004-2400  
Telephone: (202) 842-7800

20 COOLEY LLP  
21 MATTHEW BRIGHAM (191428)  
22 (mbrigham@cooley.com)  
23 JUAN PABLO GONZALEZ (334470)  
24 (jgonzalez@cooley.com)  
25 3175 Hanover Street  
26 Palo Alto, CA 94304-1130  
27 Telephone: (650) 843-5000  
28